Denatured Ethanol Specifications WSPA Position

- The denatured ethanol specifications should be set at a level that will encourage the maximum number of suppliers while at the same recognizing refiners' need for clean blendstocks
- To help ensure the cleanest ethanol possible, Phase 3 RFG or its equivalent should be used as the denaturant.

Denatured Ethanol Specifications

	RFA Proposed	WSPA Letter
Olefins (v%)	0.5	0.5
Aromatics (v%)	1.7	1.7
Benzene (v%)	0.1	0.05
Sulfur (ppm)	15	?

Denatured Ethanol Sulfur Specification

- RFA survey data for sulfur in raw ethanol ranged from 1-11 ppm
 - 11 ppm "out of the norm"
- With denaturant addition, 15 ppm limit judged to be feasible by RFA
- What impacts would a specification lower than 15 ppm have?
 - Suggest CARB and CEC evaluate

Denatured Ethanol Specification Other Issues

- Suggest CARB and CEC investigate potential impacts on "other" sources of ethanol
 - Rice straw
 - Foreign sources
- Suggest that potential for reduced denaturant addition levels be investigated
- Effective date of specifications?
- Test methods/quality assurance?